

V] Security and Safety



Following the tragic events of September 11, 2001, WSF tightened overall security and partnered with federal regulators and law enforcement agencies to coordinate threat mitigation and emergency response efforts.

Security

Background

September 11, 2001

The WSF Security Committee was formed to facilitate appropriate implementation of security measures, accurate/timely communications and reaction to pertinent emerging security issues. In July 2002, WSF's CEO, USCG Captain of the Port, and the Chief of the Washington State Patrol (WSP), signed the charter governing this joint security committee. Formal meetings have been held at least on a monthly basis to develop procedures and contingency plans aimed at ensuring the secure operation of Washington State Ferries during regular and heightened states of security threats.

The Committee agreed to the implementation of a number of new security measures during 2001-2002, all aimed at enhancing security while maintaining system viability.

During the 2001-2002 legislative sessions, the Washington State legislature took steps to fund temporary night watch personnel and a new security coordinator position for WSF. The WSP also received a \$1.8 million supplemental budget from the state legislature to enhance security measures dedicated to ferry operations.

2002

First Introduction to Passenger Security Standards from U.S. Coast Guard

In September 2002, the Coast Guard published the "Guidance on Security Procedures for Ferries Certificated to Carry More than 500 Passengers and the Terminals They Service." These guidelines included recommended security measures aboard ferries and at terminals.

Ferry officials, along with Congressional and state legislative representatives, met with Coast Guard officials to examine the intent of these guidelines as well as highlight the possible financial, operational, legal and consumer implications of implementation.

U.S. Legislation

In November 2002, President Bush signed into law the Maritime Transportation Security Act (MTSA) of 2002. The Act contained broad directions to the USCG concerning the establishment of security regulations in the maritime transportation arena. The legislation mandated a very aggressive timeline for regulatory implementation.

International Regulations

In December 2002, the International Maritime Organization (IMO) (of which the United States is a signatory nation) adopted the International Ship and Port Facility Security (ISPS) Code, aimed at enhancing maritime security across the international spectrum. These standards mandate that security measures be put into place by July 1, 2004 and are applicable to ferries on the WSF international route to Sidney, B.C.

2003

In late December 2002, the U.S. Coast Guard issued a notice of its intent to publish new security rules mandated by the MTSA, solicit industry feedback, and announcing a schedule of public meetings.

In February 2003, the U.S. Coast Guard held a public meeting in Seattle to discuss new requirements for security assessments, plans, and specific measures as they apply to ports, vessels, and waterfront facilities. Discussions focused on how to align domestic maritime requirements mandated by the Maritime Transportation Security Act (MTSA) with the International Ship and Port Facility Security (ISPS) code.

WSF provided detailed comments regarding cost, resources, labor, operational, and legal implications to the Coast Guard docket, which was open through the end of February 2003.

In March 2003, the Federal Transit Administration (FTA) sponsored a safety and security/vulnerability assessment of Washington State Ferries, as one of the 100 key transit systems in the nation, identifying security strengths and weaknesses.



MTSA Interim Final Rules

On July 1, 2003 the U.S. Coast Guard published the MTSA Interim Final Rules.

The comprehensive maritime industry rules required vessel and facility operators to complete security assessments and develop security plans by Dec. 31, 2003, with full implementation of the security measures and procedures contained in the plan by June 30, 2004.

The rules are based on the premise that increased threat equals increased security. Specifically, the rules establish three levels of security, allowing the industry to increase and decrease measures based on threat conditions.

Generally, the rules require the implementation of appropriate security measures. Accounting for varying security levels and other factors, the rules require implementation of measures such as passenger, vehicle, and baggage screening procedures; security patrols; establishing restricted areas; personnel identification procedures; access control measures; installation of surveillance equipment; and designation of security personnel. The rules require designation of, and requirements for, security officers for vessels and/or facilities, and training for security personnel, as well as training for all personnel so that they are ready and able to implement the security plan components.

The rules also provide for Alternative Security Programs, which permit flexibility and encourage innovation by allowing industry to submit, for Coast Guard approval, alternative security programs that provide a level of security equal to that required in the regulations.

July 1, 2003	Publish Interim Final MTSA Security Rules
Oct. 22, 2003	Publish MTSA Final Rules
Dec. 31, 2003	Security Plan and Assessment Submission Deadlines
June 30, 2004	Full Security Plan implementation

Security Grants

As the need for security investments became clearer, more federal grants have been made available to operators/organizations for use in their security programs.

Washington State Ferries applied for and was awarded a number of grants to help fund its security needs; such as capital costs associated with surveillance and other security equipment, as well as emergency drills and training.

2002

- \$50,000 from Federal Transit Administration to fund Emergency Preparedness Drills - one multi-agency terrorist drill and one fire drill aboard our vessels.
- Federal Port Security Grant Program – Round 1 - \$110,000 from USDOT Maritime Administration to develop a mitigation and response strategy for a chemical, biological or radiological release aboard a ferry.

2003

- Federal Port Security Grant – Round 2 – Total award of \$9.4 million dollars. The grant, although submitted prior to publication of regulations, will support some of the elements of WSF's final security plan.

\$9.4 Million Divided

\$2.5 million from the Office for Domestic Preparedness for terminal monitoring, physical enhancements and access control.

\$6.9 million from the Transportation Security Administration for vessel physical security and access control.

The Plan Forward...

In December 2003 Washington State Ferries submitted for approval a comprehensive security plan aimed at addressing applicable provisions of the final rules.

Washington State Ferries' challenge is balancing its number one priority of safe and secure transport of our ferry riders and employees, and commitment to security, against its goal of being an efficient mode of mass transit.



Safety

Background

WSF Addresses New Lifesaving Rules

Security has received considerable attention at Washington State Ferries since the terrorist attacks of September 11, 2001. However, prior to the events of 9/11, WSF had embarked on a comprehensive set of safety enhancements in response to new Coast Guard requirements regarding lifesaving measures.

Title 46, Code of Federal Regulations, Subchapter W stipulates the required lifesaving equipment, arrangements, plans, and training for all vessels, including all WSF vehicle ferries. Subchapter W became effective in 1996 and incorporated a phased-in compliance timeline, with completion of select items by October 1, 1999, and all elements by October 1, 2003.

WSF conducted, and submitted to the Coast Guard, a comprehensive Safety Risk Assessment. In turn, WSF formulated and submitted an Alternative Compliance Strategy to satisfy these new Subchapter W lifesaving rules. In early 2002, WSF gained full Coast Guard approval of its final Subchapter W Safety Risk Assessment and Alternative Compliance Plan.

The compliance plan incorporated a holistic approach to safe ferry operations, identifying those personnel/training elements, organizational components, procedural modifications and/or additions, and equipment upgrades that successfully dovetail together to satisfy the regulatory intent. Collectively, these elements address both the prevention and response aspects of ferry operations, with the goal of providing safety dividends day in and day out, as well as in an emergency.

Key Elements of the Alternative Compliance Plan

Personnel Training

Training of personnel is considered critical to the success of this important safety program. WSF is in full compliance with the minimum personnel training and drilling standards spelled out in the regulations. Furthermore, WSF incorporated training beyond these minimums, which were designed to ensure employees are taught to be proficient in the use of the new/modified equipment.

All Subchapter W specific personnel training elements have been fully completed, with all existing personnel receiving the requisite training, and with set procedures in place for all new employees to receive the appropriate training.

Organization

The creation and maintenance of the organizational elements listed below address in large part the safety management aspects of an effective safety program and are considered essential pieces of WSF's best business practices and a vital part of the Subchapter W compliance strategy.

- Adoption of Safety Management System (SMS) fleet wide (international and domestic routes) to provide a means to enhance the safety culture throughout the organization and systematize the process for continuous improvement;
- A centralized operations center, including automated dispatch support system, to ensure trained and qualified crewmembers;
- A WSF emergency operations center (EOC), to ensure a means to respond in a responsible manner in the event of an incident;
- A safety systems manager/DP position and a Safety Coordination Team that will utilize a matrix management concept to oversee WSF's safety systems.

All organizational elements of the plan have been fully implemented. The vessel engine department automated dispatch process (similar to that process already in use by the vessels Deck Department) is complete and is undergoing final beta testing.

Procedures

The system-wide application of the Safety Management System (SMS), plus publication of Subchapter W related emergency response SMS procedures and the Emergency Operations Center (EOC) Manual were important components of WSF's compliance strategy. The procedural elements incorporate the following topics:

- Modified Muster Lists
- Marine Evacuation Slide Usage
- Operational readiness, maintenance, and inspection
- Shipboard Safety Management and Contingency Plan
- Damage stability capabilities
- Towing procedures

All Subchapter W related emergency response SMS procedures, with the exception of the Emergency Operations Center (EOC) procedures and those for emergency towing, are complete and published. The EOC procedures are currently in final form, have been published, and are being distributed with an effective date of October 15, 2003. The towing procedures are being drafted and will be published to coincide with the equipment deployment discussed below.

Equipment

The main equipment additions/modifications integral to the Subchapter W compliance plan include:

- Four 150-person marine evacuation slides (MES) on each auto ferry
- New rescue boats on all operating vehicle ferries
- Additional 150-person inflatable buoyant apparatus (IBAs) on the Jumbo Mark II vessels (the vessels with the highest passenger capacity)
- Towing equipment, towing bridle for each car/passenger ferry

This equipment forms the basic physical elements of the Subchapter W compliance strategy and was necessarily and appropriately coupled with attendant procedures and training. The fleet wide cornerstones of equipment - MES and rescue boat installations - have been completed on all operating vessels. The IBA installations on the Jumbo Mark II vessels are also complete. All pieces of the towing equipment have been purchased, with all pieces now in WSF possession. Final assembly and full deployment is scheduled to be complete by the end of 2003.

In summary, WSF continues to maintain a commitment to the principles of safety that formed the basis for the Subchapter W compliance plan. This expansive effort is clearly representative of the WSF commitment to being a national leader in the consistently safe and secure transport of passengers. The Coast Guard praised WSF for its comprehensive approach to safe operations, indicating that collectively the elements of the WSF compliance plan met or exceeded the regulatory intent.

